

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

CP-11-83

Date of inspection 12/9/82 Time start 10:00 Time finish 11:00
Name of inspector GARY BONNER
Company, installation name THE METAL BANK OF AMERICA, INC.
Location 6801 STATE ROAD, PHILADELPHIA, PA
County PHILADELPHIA Municipality PHILADELPHIA
Identification number PADO46557096
Name of responsible official MARVIN DAYNO
Title EXECUTIVE VICE PRESIDENT
Mailing address 6801 STATE RD, PHILADELPHIA, PA 19135
Area code and phone no. (215) 332-6600
Name of person interviewed SAMA
Title _____
Mailing address (if different from above) _____
Area code and phone no. _____

1. Site characterization: NOT A TSD

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☒ physical, ☐ biologic
b. ☐ Storage - ☐ containers, ☐ tanks, ☐ surface impoundments, ☐ waste piles
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number: K069

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

Date of inspection 12/9/82 Identification number PAD046557096
Company, Installation name THE METAL BANK OF AMERICA, INC
County B PHILADELPHIA Municipality PHILADELPHIA

THE DEPARTMENT HAS DETERMINED THAT THE EMISSION CONTROL DUST FROM THE LEAD OPERATION MEETS THE DESCRIPTION OF K069, AND THEREFORE A LISTED HAZARDOUS WASTE. SINCE THIS WASTE IS BENEFICIALLY USED, REUSED OR RECYCLED, THE REQUIREMENTS OF 75.261(e)(1) APPLY. THE PROCESS AS DESCRIBED, HOWEVER, IS NOT REQUIRED TO HAVE THE PERMIT THAT YOU PREVIOUSLY APPLIED FOR. TO WITHDRAW THE APPLICATION AND MEET THE REQUIREMENTS OF 75.261(e)(2) AN AMENDED NOTIFICATION SHOULD BE SUBMITTED (FORM ENCLOSED). AN INSPECTION FOR COMPLIANCE WITH 75.261(e)(2) WILL BE SCHEDULED AT A LATER DATE.

IF YOU HAVE ANY QUESTIONS CALL ME AT 631-2420.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____
Inspector (signature) Gary Bonner Date 1/5/83

THE METAL BANK OF AMERICA INC.

February 3, 1983

Mr. William Walsh 3AW22
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
6th & Walnut Streets
Region 3
Philadelphia, PA 19106

Re: Hazardous Waste Permit Application

Dear Mr. Walsh:

In reference to the above subject, we wish to advise you we have withdrawn the application since it is not applicable to our operation.

This was confirmed by the recent visit of two of your engineering technicians from the Central Regional Laboratory in Annapolis, MD. These gentlemen were Ronald Jones and Gerard R. Donovan, Jr.

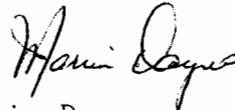
After their physical inspection, they advised us that we are not a hazardous waste site and require no license.

They informed me they had relayed this information to your office.

We trust this will close our file on this matter, and remain,

Very truly yours,

THE METAL BANK OF AMERICA INC.



Marvin Dayno

MD/mkm

cc: Mr. Gary Bonner
Department of Environmental Resources

11-22-83 33-FE
4/15/83



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III
CENTRAL REGIONAL LABORATORY
839 BESTGATE ROAD
ANNAPOLIS, MARYLAND 21401

301-224-2740
FTS-922-3752

DATE : March 31, 1983

SUBJECT: RCRA Compliance Evaluation Inspection
Metal Bank of America (PAD 046557096)

FROM : Ronald Jones *RJ*
Engineering Technician (3ES14)

TO : File

THRU: Howard O. Wilson *HOW*
Team Leader, Engineering Section (3ES14)

On January 26, 1983, the EPA, Central Regional Laboratory conducted a RCRA Compliance Evaluation Inspection at the subject facility.

Those individuals in attendance and their representations are listed below:

US EPA

Ronald Jones
Gerard Donovan

Facility

Marvin Dayno

On the day of the inspection, the inspector found that the facility is handling only one hazardous waste at the site. Approximately one year ago this facility removed the beryllium waste (P015) from the site and does not plan to handle it in the future. The emission control dust and sludge (K069) is sold to a local company.

The facility representative, Mr. Dayno, stated that the Pennsylvania Department of Environmental Resources was going to remove this facility from all RCRA lists. After talking to the state inspector, the state was removing the facility from the TSD list, but it would remain as a generator of hazardous waste (K069) even though the waste is sold for reuse (Section 261.6 (b)). The facility had apparently misunderstood the proposed actions of the state inspector.

RCRA checklists were not completed based on the statement by Mr. Dayno that the State of Pennsylvania did not consider his operations as those of a generator or TSD facility of hazardous waste. However, it is the inspector's recollection that the facility was not in compliance with all of the requirements for a hazardous waste generator.

HOW/jlm



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
CENTRAL REGIONAL LABORATORY
839 BESTGATE ROAD
ANNAPOLIS, MARYLAND 21401

March 31, 1983

Mr. Bruce Beitler
Bureau of Solid Waste Management
Pennsylvania Dept. of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pennsylvania 19401

Dear Mr. Beitler:

On January 26, 1983, an inspection was conducted at The Metal Bank of America, Inc., 6801 State Road, Philadelphia, Pennsylvania, to determine its compliance with the Resource Conservation and Recovery Act and its regulations.

RCRA checklists were not completed based on the statement by Mr. Dayno, the facility representative, that the State of Pennsylvania did not consider his operations as those of a generator or TSD facility of hazardous waste.

Subsequently, it was determined that the facility is a hazardous waste generator subject to the regulations.

Should you have any questions regarding the inspection, please contact this office.

Sincerely,

A handwritten signature in cursive script that reads "Ronald Jones".

Ronald Jones
Engineering Technician

RJ/jlm

GEN

SUBJECT: RCRA Inspection - METAL BANK OF AMERICA
PHILA., PA. PAD 046557096

DATE: 8/9/88

FROM: g/k Gregory A. Koltonuk, [REDACTED]
RCRA Enforcement Section (3HW)

TO: File

THRU: VICKY BINETTI, CHIEF - RCRA ENFORCEMENT SECTION, 3HW15

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS
REQUIRED AT THIS TIME.

**Hazardous Waste Inspection Report
TSD Facilities - Part A**

Date of inspection 6/27/88 Time start Time finish
 Name of inspector Robert Zang
 Company, installation name Metal Bank of America
 Location Cottman & Milnor
 County Phila Municipality Phila
 Identification number PAD 046557096
 Name of responsible official Union Corp. (site owner)
 Title (CT)
 Mailing address 6801 State Road, Phila, PA
 Area code and telephone number
 Name of person interviewed Jack Kelly / EPA Superfund
 Title
 Mailing address (if different from above)
 Area code and telephone number 215-597-3168

1. Site characterization: N/A (SITE CLOSED)

- | | | | | | |
|----|------------------------------------|---|-----------------------------------|---|--|
| a. | <input type="checkbox"/> Treatment | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> chemical | <input type="checkbox"/> physical | <input type="checkbox"/> biological |
| b. | <input type="checkbox"/> Storage | <input type="checkbox"/> containers | <input type="checkbox"/> tanks | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> waste piles |
| c. | <input type="checkbox"/> Disposal | <input type="checkbox"/> land treatment | <input type="checkbox"/> landfill | <input type="checkbox"/> incineration | <input type="checkbox"/> thermal treatment |
| d. | <input type="checkbox"/> Use | <input type="checkbox"/> reuse | <input type="checkbox"/> recycle | <input type="checkbox"/> reclaim | |

2. Does the facility generate hazardous wastes? ☐ Yes ☒ No

3. Types of hazardous waste produced by Hazardous Waste Number: N/A

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 6/27/88 Identification Number PAD046557096
Company, Installation Name Metal Bank of America
County Phila Municipality Phila

According to Mr. Kelly, this facility is a closed RCRA site and the company is not conducting any business there. The site has been the subject of remediation as the result of PCB groundwater contamination. This report will serve as the final RCRA report for this site.

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Person Interviewed (signature) Robert Zeng Date 6/27/88
Inspector (signature) Robert Zeng Date 6/27/88